

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:	Chapter 7
PAUL HANSMEIER,	No. 15-42460
Debtor.	

PAUL HANSMEIER, Debtor,	Adv. No. 16-04124
Plaintiff	

v.

SANDIPAN CHOWDHURY and BOOTH SWEET LLP,
Defendants.

AFFIDAVIT OF COMPLIANCE

I, Jason Sweet, state under penalty of perjury that the following is true and based on personal knowledge.

1. I am an attorney at law licensed to practice before the Courts of the State of Massachusetts, the First Circuit, The Seventh Circuit and the Sixth Circuit. I represent the Defendants, Sandipan Chowdhury and Booth Sweet LLP, in this matter.
2. I submit this affidavit in response to the Court's Report & Recommendation [Doc. 130] filed January 14, 2019.
3. On January 16, 2019, Defendants complied with the discovery requests as ordered by the Court. Defendants have produced all documents within their custody, possession or control as identified in their discovery responses.
4. Defendants did not produce their tax returns. Income tax returns are generally regarded as confidential as a matter of public policy. Courts of this circuit apply a two-prong test in determining the discoverability of tax returns. In general, the returns must not only have discovery relevancy to the claims or defenses, but the requesting party must show a convincing need for the returns in the sense that the same information is unobtainable from other sources. *See East Iowa Plastics, Inc. v. Pi, Inc.*, 2014 U.S. Dist. LEXIS 69908, *16-20 (N.D. Iowa May

21, 2014) (citing cases). Independent of any objections Defendants could raise, Plaintiff must first move this Court for production and show that the returns would include information otherwise unobtainable in the documents already produced.

5. In the event the Court determines production of the tax returns is relevant, Defendants ask that they be allowed to redact any social security numbers and the returns be subject to a protective order.
6. The discovery documents were uploaded to Google Drive and shared via email with the Plaintiff at prhansmeier@gmail.com. Exhibit A.

I, Jason Sweet, hereby declare pursuant to 28 U.S.C. § 1746 under penalty of perjury that the foregoing is true and correct based on personal knowledge, and a review of the pleadings and other documents filed on the Court's docket set forth above. Executed at Cambridge, Massachusetts on this 16th day of January, 2019.

s/ Jason E. Sweet

BOOTH SWEET LLP
BBO# 668596
32R Essex Street
Cambridge, MA 02139
Tel.: (617) 250-8619
Fax: (617) 250-8883
Email: jsweet@boothsweet.com

Counsel for Defendant

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:	Chapter 7
PAUL HANSMEIER,	No. 15-42460
Debtor.	

PAUL HANSMEIER, Debtor,	Adv. No. 16-04124
Plaintiff	

v.

SANDIPAN CHOWDHURY and BOOTH SWEET LLP,
Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on January 16, 2019 a copy of the foregoing affidavit was filed electronically through the ECF system. Notice of the filing will be sent to all parties by operation of the Court's electronic filing system. Notice will be delivered via first class mail to:

Paul R. Hansmeier
9272 Cortland Alcove
Woodbury, MN 55125

s/ Jason E. Sweet

Drive

New

My Drive

Discovery Documents

Booth Sweet LLP

Corp Docs

Financials

Sandipan Chowdhury

Corp Docs

Financials

401k

Auto Lo...

BoA

BoA Cr...

BoA Cr...

DCU Ch...

DCU Cr...

DCU Ho...

Mortga...

Computers

Shared with me

Recent

Starred

Trash

Search Drive

My Drive > Discovery Documents

Folders

Booth Sweet LLP

Sandipan Chowdhury

Share with others

Get shareable link

People

prhansmeier@gmail.com x Add more people...

Add a note

Notify people

Send Cancel

Advanced